Southern Comments to North Proposal

IFC Chapter 1 Administration, Table 105.6.9

PURPOSE OF CHANGE:
Add a permit to Table 105.6.9 for Pyrophoric Compressed Gas as currently required by CFC Section 105 Table 105-A

TABLE 105.6.9
PERMIT AMOUNTS FOR COMPRESSED GASES

TYPE OF GAS	AMOUNT (cubic feet at NTP)
Corrosive	200
Flammable (except cryogenic fluids and liquefied petroleum gases)	200
Highly toxic	Any Amount
Inert and simple asphyxiant	6,000
Oxidizing (including oxygen)	504
Pyrophoric	Any Amout
Toxic	Any Amount

South is in agreement as it appears to be an oversight.

IFC Chapter 1, Administration, Table 105.6.21

PURPOSE OF CHANGE:
Change the permit amount for Corrosive Solids in Table 105.6.21 from 1,000 pounds to that required by the current 2001 CFC Section 105 Table 105-C, 500 pounds.

TABLE 105.6.21
PERMIT AMOUNTS FOR HAZARDOUS MATERIALS

TYPE OF MATERIAL	AMOUNT
Combustible liquids	See Section 105.6.17
Corrosive materials Gases Liquids Solids	 See Section 105.6.9 55 gallons ~~1000 pounds~~ 500 pounds

South – Don't waste our time…

IFC & IBC, Chapter 10 Means of Egress, Table 1005.1

PURPOSE OF CHANGE:
Increases Table 1005.1 of the IFC and IBC Table 1005.1 [Egress Width Per Occupant Served] to the width per occupant served, to remain consistent with Group H Occupancies and maintain the current standard of care of the 2001 CBC.

TABLE 1005.1
EGRESS WIDTH PER OCCUPANT SERVED OCCUPANCY ~~WITHOUT SPRINKLER SYSTEM WITH SPRINKLER SYSTEM~~ a

OCCUPANCY	WITHOUT SPRINKLER SYSTEM		WITH SPRINKLER SYSTEM a	
	Stairways (inches per occupant)	Other egress components (inches per occupant)	Stairways (inches per occupant)	Other egress components (inches per occupant)
Occupancies other than those listed below	0.3	0.2	0.2	0.15
Hazardous: H-1, H-2, H-3 and H-4	~~0.7~~ Not Applicable	~~0.4~~ Not Applicable	~~0.3~~ 0.7	~~0.2~~ 0.4
Institutional: I-2	Not Applicable	Not Applicable	0.3	0.2

For SI: 1 inch = 25.4 mm.
a. Buildings equipped throughout with an automatic sprinkler system in accordance with Section 903.3.1.1 or 903.3.1.2 .

South Comments:
Why do you need a wider exit width in an H? What happens with a toxic gas? What if it is the exit width out of a gas room? After much discussion South disagrees. Go with what is in the IBC. NOTE: If this would come into affect due to area or occupant load, travel distance would be more critical and two exits would already be required.

IFC and IBC Chapter 10 Means of Egress, Table 1015.1

PRURPOSE OF CHANGE:

Reduce the IFC and IBC Table 1015.1 [Exit Access Travel Distances] for H occupancies to maintain the current standard of care of the 2001 CBC Article 1007.4.2.1 The exit access travel distance stated in Table 1015.1 of the IBC and IFC is much greater than allowed by current code. In order to maintain the current standard of care we recommend the travel distances be reduced to current code distances.

TABLE 1015.1
EXIT ACCESS TRAVEL DISTANCE a

OCCUPANCY	WITHOUT SPRINKLER SYSTEM (feet)	WITH SPRINKLER SYSTEM (feet)
A, E, F-1, I-1, M, R, S-1	200	250 b
B	200	300 c
F-2, S-2, U	300	400 b
H-1	Not Permitted	75 c
H-2	Not Permitted	~~100~~ 75 c
H-3	Not Permitted	~~150~~ 75 c
H-4	Not Permitted	~~175~~ 100 c
H-5	Not Permitted	~~200~~ 100 c
I-2, I-3, I-4	150	200 c

For SI: 1 foot = 304.8 mm.
a. See the following sections for modifications to exit access travel distance requirements:

Section 402 of the *International Building Code:* For the distance limitation in malls.
Section 404 of the *International Building Code:* For the distance limitation through an atrium space.
Section 1015.2 : For increased limitation in Groups F-1 and S-1.
Section 1024.7 : For increased limitation in assembly seating.
Section 1024.7 : For increased limitation for assembly open-air seating.
Section 1018.2 : For buildings with one exit.
Chapter 31 of the *International Building Code:* For the limitation in temporary structures.

b. Buildings equipped throughout with an automatic sprinkler system in accordance with Section 903.3.1.1 or 903.3.1.2 . See Section 903 for occupancies where sprinkler systems according to Section 903.3.1.2 are permitted.
c. Buildings equipped throughout with an automatic sprinkler system in accordance with Section 903.3.1.1 .

South Comments:
This may be a comparison between items from the Uniform to the International where we are not comparing the same information. South is in disagreement. Note: the overall travel distance is less in the International, **therefore accept as is.**

IFC Chapter 27, Hazardous Materials, General Provisions, Section 2701.5.1

PURPOSE OF CHANGE:
Section 2701.5.1 of the 2006 IFC provides the general guidelines for the submittal of a Hazardous Materials Management Plan (HMMP). The Office of the State Fire Marshal is proposing to add the requirement that the HMMP shall also comply with the provisions of the Health and Safety Code and Title 19 to ensure that the HMMP provides the necessary information to comply with the minimum statewide standards for the plan.

2701.5.1 Hazardous Materials Management Plan. Where required by the fire code official, each application for a permit shall include a Hazardous Materials Management Plan (HMMP). The HMMP shall include a facility site plan designating the following:

1. Storage and use areas.
2. Maximum amount of each material stored or used in each area.
3. Range of container sizes.
4. Locations of emergency isolation and mitigation valves and devices.
5. Product conveying piping containing liquids or gases, other than utility-owned fuel gas lines and low- pressure fuel gas lines.
6. On and off positions of valves for valves that are of the self –indicating type.
7. Storage plan showing the intended storage arrangement, including the location and dimensions of aisles.
8. The location and type of emergency equipment. The plans shall be legible and drawn approximately to scale. Separate distribution systems are allowed to be shown on separate pages.

<u>{For SFM} The HMMP shall comply with Health and Safety Code, Chapter 6.95, Sections 25500 through 25545, and Title 19, Division 2, Chapter 3.</u>

South AGREES. This is the same comment turned in for Core Team review.

IFC Chapter 27, Hazardous Materials, General Provisions, Section 2701.5.2

PURPOSE OF CHANGE:
Section 2701.5.2 of the 2006 IFC provides the general guidelines for the submittal of a Hazardous Materials Inventory Statement (HMIS). The Office of the State Fire Marshal is proposing to add the requirement that the HMIS shall also comply with the provisions of the Health and Safety Code and Title 19 to ensure that the HMIS provides the necessary information to comply with the minimum statewide standards for the inventory statement.

2701.5.2 Hazardous Materials Inventory Statement (HMIS). Where required by the fire code official, an applicant for a permit shall include an HMIS, such as SARA (Superfund Amendments and Reauthorization Act of 1986), Title III, Tier II Report, or other approved statement. The HMIS shall include the following information:

1. Manufacturer's name.
2. Chemical name, trade names, hazardous ingredients.
3. Hazard classification.
4. MSDS or equivalent.
5. United Nations (UN), North America (NA), or the Chemical Abstract Service (CAS) identification number.
6. Maximum quantity stored or used on-site at one time.
7. Storage conditions related to the storage type, temperature and pressure.

<u>{For SFM} The HMIS shall comply with the Health and Safety Code, Chapter 6.95, Sections 25500 through 25545, and Title 19, Division 2, Chapter 3.</u>

South AGREES. This is the same comment turned in for Core Team review.

IFC Chapter 27, Hazardous Materials, General Provisions, Section 2704.3.1

PURPOSE OF CHANGE:
Section 2704.3.1 of the 2006 IFC provides the general requirements for exhaust ventilation systems. The Office of the State Fire Marshal is proposing to add an "Exception" to delete the requirement for a manual exhaust ventilation shutoff switch when all of the hazardous dusts, mists, fumes, vapors, and gases are completely exhausted outside of the building. To provide a manual shutoff switch in this instance would increase the likelihood of hazardous components migrating throughout the interior of the building and exposing its' occupants.

2704.3.1 System Requirements. Exhaust ventilation systems shall comply with all of the following*:*

1. Installation shall be in accordance with the *International Mechanical Code.*
2. Mechanical ventilation shall be at a rate of not less than 1 cubic foot per minute per square foot [0.00508 m3/(sm2)] of floor area over the storage area.

3. Systems shall operate continuously unless alternative designs are approved.
4. A manual shutoff control shall be provided outside of the room in a position adjacent to the access door to the room or in an approved location. The switch shall be of the break –glass or other approved type and shall be labeled "VENTILATION SYSTEM EMERGENCY SHUTOFF".

   EXCEPTION: {For SFM} When exhaust systems containing explosive, corrosive, combustible, flammable or highly toxic dusts, mists, fumes, vapors, or gases are 100 percent exhausted to the outside, an emergency ventilation system shutoff is not required.

5. Exhaust ventilation shall be designed to consider the density of the potential fumes or vapors released. For fumes or vapors that are heavier than air, exhaust shall be taken from a point within 12 inches (305 mm) of the floor. For fumes or vapors that are lighter than air, exhaust shall be taken from a point within 12 inches (305 mm) of the highest point of the room.
6. The location of both the exhaust and inlet air openings shall be designed to provide air movement across all portions of the floor or room to prevent the accumulation of vapors.
7. Exhaust air shall not be recirculated to occupied areas if the materials stored are capable of emitting hazardous vapors and contaminants have not been removed. Air-contaminated with explosive or flammable vapors, fumes, or dusts; flammable, highly toxic or toxic gases; or radioactive materials shall not be recirculated.

SOUTH – cannot support at this time. This would limit the first responder's option to control an emergency situation. Just because the provision exists in the CFC currently, doesn't mean it was justified.

IFC Chapter 31, Corrosive Materials, Section 3104.2.1

PURPOSE OF CHANGE:
The change would maintain the current requirement for secondary containment found in the 2001 California Fire Code under Sections 8003.1.3.3 and Table 8003.1-A.

3104.2.1 Above-ground outside storage tanks.
When required by Section 2704.2.2 above-ground outside storage tanks ~~exceeding an aggregate quantity of 1,000 gallons (3785 L)~~ of corrosive liquids shall be provided with secondary containment ~~in accordance with Section 2704.2.2~~

South does not support. This is already addressed…what is the definition of a tank is more an issue. Containment is an issue already due to Water Quality and other Environmental issues. This eliminates the requirement to provide containment for example: 3,000 55-gallon drums outside.

IFC Chapter 37, Highly Toxic and Toxic Materials, Section 3704.2.2.7

PURPOSE OF CHANGE:
We propose that the California State Fire Marshal in the adoption of the 2006 CFC delete Exception 2 of IFC 3704.2.2.7 Treatment Systems.

It is our feeling that although Exception 1 utilizes new and available technologies, Exception substantially reduces Community and Emergency Responder Safety. Elimination of abatement or containment systems for Toxic Gases reduces the current standard of care and exposes the local community to extraordinary Health Hazards. Although the utilization of a modern shut off valve is a positive step. There are toxic leak paths that exist around the valve and through other appurtenances.

3704.2.2.7 Treatment systems.
The exhaust ventilation from gas cabinets, exhausted enclosures and gas rooms, and local exhaust systems required in Sections 3704.2.2.4 and 3704.2.2.5 shall be directed to a treatment system. The treatment system shall be utilized to handle the accidental release of gas and to process exhaust ventilation. The treatment system shall be designed in accordance with Sections 3704.2.2.7.1 through 3704.2.2.7.5 and Section 510 of the *International Mechanical Code.*

Exceptions:

1. Highly toxic and toxic gases—storage. A treatment system is not required for cylinders, containers and tanks in storage when all of the following controls are provided:
1.1. Valve outlets are equipped with gas-tight outlet plugs or caps.
1.2. Handwheel-operated valves have handles secured to prevent movement.
1.3. Approved containment vessels or containment systems are provided in accordance with Section 3704.2.2.3 .

~~2. Toxic gases—use. Treatment systems are not required for toxic gases supplied by cylinders or portable tanks not exceeding 660 gallons (2 498 L) liquid capacity when the following are provided:~~
~~2.1. A gas detection system with a sensing interval not exceeding 5 minutes.~~
~~2.2. An approved automatic-closing fail-safe valve located immediately adjacent to cylinder valves. The fail-safe valve shall close when gas is detected at the permissible exposure limit (PEL) by a gas detection system monitoring the exhaust system at the point of discharge from the gas cabinet, exhausted enclosure, ventilated enclosure or gas room. The gas detection shall comply with Section 3704.2.2.10 .~~

AM&M's have been accepted in the past for this type of system. This gives specific criteria for utilizing this type of criteria. The current allowance would ONLY be applicable to toxic and not highly toxic gases. South is not in support of this change.

IFC Chapter 37 Highly Toxic and Toxic Materials, Section 3705.1, Delete exception #2

PURPOSE OF CHANGE:
We propose to delete Section 3705.1, exception #2 that exempts Group H-5 Occupancies from the safeguards required by this Section for Ozone Gas Generating equipment. Since the semiconductor industry uses Ozone Gas generators, which is a Fire Code defined Highly Toxic Gas, they should be included in the safeguards provided by this Section of the Code. It simply retains the Standard of Care found in the 2001 California Fire Code in Appendix II-I.

3705.1 Scope.
Ozone gas generators having a maximum ozone-generating capacity of 0.5 pound (0.23 kg) or more over a 24-hour period shall be in accordance with this section.

Exception: Ozone-generating equipment used in Group R-3 occupancies.
~~Ozone-generating equipment used in Group H-5 occupancies.~~

South is in support of the North!! The specific requirements for ozone will require additional safeguards that would not otherwise be in an H5.